

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF TEXAS  
BEAUMONT DIVISION

GOODHUE PARTNERS, LLC

Plaintiff,

vs.

WESTERN WORLD INSURANCE COMPANY

Defendant.

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Civil Action no: \_\_\_\_\_

**DEFENDANT'S NOTICE OF REMOVAL**

TO THE HONORABLE UNITED STATES DISTRICT COURT:

Defendant Western World Insurance Company files this Notice of Removal.

1. Plaintiff Goodhue Partners, LLC is now and at the time suit was filed was a citizen of the State of Texas. (Appendix page 004, ¶ 3.)

2. Defendant Western World Insurance Company is now a corporation incorporated in the State of New Hampshire and with its principal place of business in New Jersey, and at the time suit was filed was a corporation incorporated in the State of New Hampshire and with its principal place of business in New Jersey. (Appendix page 012.)

3. Because Plaintiff is now and was a citizen of Texas when suit was filed, and because Defendant Western World is now and was at the time suit was filed a citizen of New Hampshire and New Jersey, complete diversity of citizenship exists among the parties.

4. Defendant Western World files this Notice of Removal within 30 days of the date that the Defendant was notified of the suit. (See Appendix pages 001 - 011.)

5. The amount in controversy exceeds \$75,000.00, exclusive of interests and costs. (See Appendix page 004, ¶ 1.)

6. Because complete diversity of citizenship exists among the parties, and because the

amount in controversy exceeds \$75,000.00 exclusive of interests and costs, this action is removable under 28 U.S.C. §§ 1332 and 1441.

7. Venue is proper in the present Court pursuant to 28 U.S.C. 1441(a), because the U.S. District Court for the Eastern District of Texas, Beaumont Division, embraces the 172<sup>nd</sup> District Court, Jefferson County Texas, where the State Court Action was originally filed and where the property is located.

8. True and correct copies of the state court filings to date are attached to this Notice. (See Appendix pages 013 - 027.)

### **CONCLUSION**

By this Notice of Removal, Defendant does not waive any objections it may have as to service, jurisdiction or venue or any other defenses or objections it may have to this action, except as expressly herein admitted, and Western World expressly reserves all defenses, motions and pleas.

Respectfully submitted,

By: s/*Robert G. Hogue*  
Robert G. Hogue  
State Bar No. 09811050  
ROBERT G. HOGUE, P.C.  
Highland Park Place  
4514 Cole Avenue, Suite 600  
Dallas, Texas 75205-4193  
Phone: (214) 559-7107  
Fax: (214) 559-7101  
email: robhogue@msn.com

COUNSEL FOR DEFENDANT  
WESTERN WORLD INSURANCE COMPANY

**CERTIFICATE OF SERVICE**

I hereby certify that on November 22, 2019, the foregoing document was served on counsel of record for the Plaintiff as follows:

CHARLES A. BENNETT  
Charles A. Bennett Law, PLLC  
12770 Coit Road, Suite 720  
Dallas, Texas 75251

Via e-service

By: s/Robert G. Hogue  
Robert G. Hogue